

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

CAPE DOGWOOD REDEVELOPMENT,  
CORP.,

Plaintiff,

v.

GLOBAL BOWLING, LLC, et al.

Defendants.

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Case No. 1:19-CV-00023

**MOTION TO WITHDRAW AS COUNSEL**

Thompson Coburn LLP, by and through attorneys Jason A. Wheeler and William R. Wurm (collectively, “Thompson Coburn”), respectively move for leave to withdraw as counsel for Defendants Global Bowling, LLC, Michael Conejo, and Brent Dyer (“Defendants”) in this matter, and in support thereof state as follows:

1. Thompson Coburn is currently counsel of record for Defendants in this matter.
2. Professional considerations have arisen that make it necessary for Thompson Coburn to withdraw as counsel for Defendants in this matter.
3. Missouri Rule of Professional Conduct 1.6 precludes Thompson Coburn from providing further detail concerning the professional considerations that have arisen necessitating its withdrawal.
4. Defendants were notified on April 13, 2020, and again on June 4, 2020, of the need for Thompson Coburn to file this Motion.
5. Thompson Coburn respectfully requests appropriate extensions of the remaining deadlines in the Court’s Scheduling Order to minimize any potential prejudice to Defendants.

WHEREFORE, Thompson Coburn LLP, Jason A. Wheeler, and William R. Wurm respectfully request that this Court enter an order granting them leave to withdraw as counsel of record for Defendants Global Bowling, LLC, Michael Conejo, and Brent Dyer, and for whatever further relief the Court deems just and necessary.

Dated: June 12, 2020

Respectfully submitted,

**THOMPSON COBURN LLP**

By: /s/ William R. Wurm  
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Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via all counsel of record via the Court's electronic case filing system.

/s/ William R. Wurm